

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CR. NO. 7:21-CR-535-01
	§	
KENNETH B. PONCE	§	

**DEFENDANT'S MOTION TO AMEND TERMS
AND CONDITIONS OF RELEASE
TO ALLOW DEFENDANT TO TRAVEL**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant, **KENNETH B. PONCE**, by and through his undersigned counsel and moves this Honorable Court to amend the terms and conditions of his release on bail to allow him to travel to Uvalde, Texas, and in support thereof would respectfully show as follows:

I.

Defendant is set for sentencing September 23, 2021, before this Honorable court.

II.

Defendant request permission to travel to Uvalde, Texas while he is out-on-bond. Defendant would be traveling with his family to attend a yearly family reunion. Defendant would be traveling from July 26, 2021 thru July 30, 2021. Defendant will be staying at a cabin on the park property located at 1108 Chalk Bluff Rd., Uvalde, Texas 78801 with a phone number for the park being (830) 278-5515.

III.

The Defendant represents to the court that he continues to abide by all the requirements of his release on bail and will be present in court on the date ordered by this Honorable Court.

IV.

A.U.S.A., Robert Lopez, is unopposed, and Pre-trial Service Officer, Laura Iglesias is also unopposed.

V.

This motion for continuance is not made for purpose of delay but only so that justice can be done.

WHEREFORE, PREMISES CONSIDERED, defendant prays that the Honorable Court amend his terms and conditions of release to permit him to travel to Uvalde, Texas.

Respectfully Submitted,

/S/CRISPIN (C.J.) QUINTANILLA, III
CRISPIN (C.J.) QUINTANILLA, III
State Bar No. 16436330
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

On this the 24th day of June, 2021, I do hereby certify that a true and correct copy of the above and foregoing document has been sent to the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following A.U.S.A. Robert Lopez and U.S.Pre-Trial Service Officer, Laura Iglesias.

/S/CRISPIN (C.J.) QUINTANILLA, III
CRISPIN (C.J.) QUINTANILLA, III

CERTIFICATE OF CONSULTATION

I hereby certify that I have consulted with A.U.S.A., Robert Lopez, and he is unopposed, and Pre-Trial Service Officer, Laura Iglesias is unopposed to allow defendant to travel to Uvalde, Texas while his is out-on-bond .

/S/CRISPIN (C.J.) QUINTANILLA, III
CRISPIN (C.J.) QUINTANILLA, III